

## REMARKS

This communication is a full and timely response to the Office Action dated March 17, 2011. Claims 1-5 are pending. By this communication, claim 1 has been amended and new claim 6 has been added. Support for the amended subject matter can be found, for example, on page 1, lines 18-20; page 2, lines 31-32; and page 5, lines 3-6 of the disclosure.

### **Rejection under 35 U.S.C. 102**

On page 2 of the Office Action, claims 1-5 are rejected under 35 U.S.C. §102(e) for alleged anticipation by *Schoettger* (U.S. Patent Publication No. 2004/0139111). Applicants respectfully traverse this rejection.

Applicants Figures 1-3 illustrate exemplary embodiments directed to “utilities”, e.g., companies tasked with distributing certain goods such as electricity, energy, or water to residents within a specified geographical range. To this end, the utilities own a very large number of physical “real-world” assets, such as components or “primary devices” that fulfill a certain function according to the operation of the utilities. This function can include switching electrical power or monitoring a process quantity. These components are generally not intelligent, in that they do not include a CPU and are not connected to a communication or computer network.

The assets or components have properties or parameters that are referred to in various IT systems of the utility. These IT systems belong to various sources or participating applications, which are directed to operational aspects (e.g. SCADA = supervisory control and data acquisition) or maintenance aspects (e.g. CMMS – computerized maintenance management systems) related to the usage or wear of

the assets in distributing the above-mentioned goods. In order to represent the assets or components, a single physical asset of the utility is modeled or represented as an entity or software object in the data sets of the IT systems of the various applications, with the properties of the asset being assigned to specific attributes of the entity.

To enable a consistency service to access the actual attribute values of an entity, reference or meta-information about the entity is stored in a reference storage or database. This information comprises e.g. a local identifier in order to access the entity in the application, and an application identifier that allows the consistency service to direct any requests related to that entity to an adapter of the IT system of the application. An adapter acquires and translates the requested information from the application via a polling mechanism and without a need for modifying the application.

Independent claim 1 broadly encompasses the foregoing features by reciting the following:

A method for validating consistency of entities modeling a physical asset of a utility, which entities are stored in data sets of a multitude of different IT systems of the utility, wherein a consistency service includes:

- an input buffer in which an entity to be validated for consistency can be placed;
- output means in which the result of the consistency validation can be stored and
- communication means to communicate with the different IT systems,

wherein an adapter for each of the IT systems allows communication between the consistency service and the IT systems, such that a signal sent by the consistency service to verify an existence of a specific data set of an IT system can be sent back to the consistency service if that specific data set exists, and

wherein a reference container holds references to the entities in the data sets of the various IT systems such that a specific entity in a specific IT system can be addressed through the adapter of the specific IT system,

said method comprising the following steps:  
loading a reference to the entity to be validated for consistency into the buffer of the consistency service;  
the consistency service, sending a signal to verify the existence of a specific data set of an IT system to the IT system holding the entity to be validated for consistency; and  
storing consistency validating information in the output means, based on the signal being sent back to the consistency service.

*Schöttger* does not anticipate independent claim 1. This document is directed to a system that provides a common learning environment and functions as an administrative tool for learning delivery and tracking, such as courseware data, where courseware includes tests and/or general teaching data (*Schöttger*, paragraph 29). Prior to bulk loading of a customer's Enterprise Learning Platform (ELP) instance database, a data file from the customer is received by the Learning Management System (LMS) and "loaded for verification". The verification process includes determining "whether the correct data types and data lengths are present" (paragraph 50). This process fails if "data does not match the predefined format" (paragraph 32). On the other hand, if verification is successful, the data is converted to the format required for bulk loading (paragraph 51).

Applicants submit that *Schöttger* discloses neither physical assets of a utility nor a multitude of IT systems storing entities modeling these assets. Furthermore, the step of verification according to *Schöttger* involves a "correct" or standard format which one of skill in the art would have understood to be a universally valid or accepted reference format that is not open to modification by a single party or IT system. Hence, the inconsistency problem that the present application intends to solve does not appear to be present in *Schöttger*.

For at least these reasons, *Schöttger* does not anticipate Applicants' claims as alleged. Withdrawal of this rejection, therefore is respectfully requested.

### CONCLUSION

Based on the foregoing amendments and remarks, claims 1-6 are believed to be allowable and this application in condition for allowance. In the event any issues adverse to allowance remain and/or the Examiner believes that further prosecution would benefit from an interview, the Examiner is invited to contact Applicants' representative identified below.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

Date: June 17, 2011

By: /Shawn B. Cage/  
Shawn B. Cage  
Registration No. 51522

**Customer No. 21839**  
703 836 6620